BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2019-64-WS

Application of CUC, Inc. for Adjustment of Rates and Charges)	PETITION TO INTERVENE
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Callawassie Island Property Owners Association, Inc. ("CIPOA") and Spring Island
Property Owners Association ("SIPOA") (together "Petitioners") hereby petition the South
Carolina Public Service Commission ("Commission") pursuant to Rule 103-825 of its Rules of
Practice and Procedure (10 S.C. Code Ann. Regs. 103-825), to be allowed to intervene as formal
parties of record in the above-captioned proceeding. In support of this Petition, Petitioners
would show as follows:

- 1. On July 23, 2019, CUC, Inc. ("CUC" or "Applicant") filed an Application for approval to increase its rates for water and sewer services. The Application was filed pursuant to S.C. Code Ann. §58-5-240 and the Commission's rules and regulations. According to the Application, CUC provides sewer collection and sewer treatment service and water distribution service to customers on Callawassie Island and Spring Island in Beaufort County, South Carolina.
- 2. Petitioners are associations whose members include Callawassie Island and Spring Island property owners and residents, many of whom are CUC's residential and commercial water and sewer customers.
 - 3. The Commission's Docketing department issued a Revised Notice of Filing in

this matter, setting a deadline for intervention in this Docket of September 24, 2019.

The Petitioners have a vital interest in this proceeding. Petitioners' members who are CUC residential and commercial water and sewer customers will be affected by the proposed rate increase because it would increase their water and sewer service rates.

- 4. At this time, Petitioners oppose the proposed rate increase, but do not possess sufficient information to form a more detailed position in this proceeding. Participation in this Docket will allow Petitioners to obtain the information necessary to establish that position.
- 5. Petitioners seek to participate in this proceeding in order to more fully establish and assert their position and in order to assist in addressing the important issues raised.

 Petitioners should therefore be permitted to intervene in this proceeding in order to participate fully and present testimony and other evidence as appropriate.
 - 6. Petitioners' authorized representative in this proceeding is:

John J. Pringle, Jr.

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7. Petitioners request that they be allowed to intervene in the above-captioned matter, that they be permitted to participate fully as parties of record, to present testimony, cross-examine witnesses, and assert whatever position they deem to be appropriate.

WHEREFORE, Petitioners pray for the following relief:

- a. That the Commission accept this Petition to Intervene and make Petitioners intervenors and parties of record;
- b. That the Commission allow Petitioners to participate fully in this proceeding and take such positions as they deem advisable; and
- c. That the Commission grant such other and further relief as is just and proper.

Respectfully submitted,

ADAMS AND REESE, LLP

BY:

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Attorneys for Callawassie Island Property Owners Association, Inc. and Spring Island Property Owners Association

August 15, 2019 Columbia, South Carolina

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2019-64-WS

Application of CUC, Inc. for Adjustment of Rates and Charges))	CERTIFICATE OF SERVICE
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This is to certify that I have served the **Petition to Intervene** of Callawassie Island Property Owners Association, Inc. and Spring Island Property Owners Association via first-class mail service and electronic mail service as follows:

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John J. Pringle, Jr.

August 15, 2019 Columbia, South Carolina